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AO 91 (Rev 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Martino Dante LORENZI
(DOB: 01/XX/1988)

Case No. 2:22-mj-375

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Feb. 22, 2022 thru May 26, 2022 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:*Code Section*18 U.S.C. 371
18 U.S.C. 922(a)(1)(A)*Offense Description*-Conspiracy to violate federal law (engaging in the business of firearms
dealing without a license)

This criminal complaint is based on these facts:

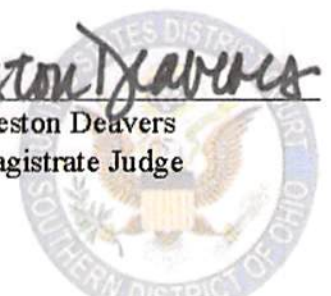
See attached Affidavit.

☒ Continued on the attached sheet.*Complainant's signature*

Teresa J. Petit, ATF Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: May 26, 2022City and state: Columbus, Ohio
Elizabeth A. Preston Deavers
United States Magistrate Judge

ATTACHMENT A

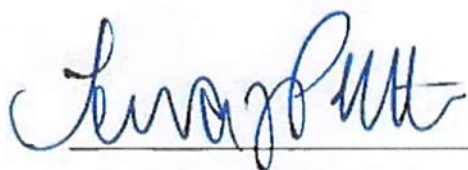
I, Teresa Petit, being duly sworn, depose and state that:

I have been a Special Agent, with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since May of 2014. I am a graduate of the ATF National Academy Special Agent Basic Training Program and the Federal Law Enforcement Training Center, Criminal Investigator Training Program. As a result of my training and experience as an ATF Special Agent, I am familiar with Federal criminal laws pertaining to firearms violations. As a Special Agent, I am also authorized to carry firearms, execute warrants, make arrests for offenses against the United States, and perform other such duties as authorized by law.

- 1. This affidavit is made in support of a criminal complaint against Martino D. LORENZI, (DOB: 01/22/1988) who, with others, engaged in a conspiracy to engage in the business of dealing in firearms without a license, in violation of Title 18, United States Code, Sections 371 and 922(a)(1)(A).**
- 2. The statements in this affidavit are based upon my training and experience, consultation with other experienced investigators and agents, review of related police reports, and other sources of information relative to firearms investigations. This affidavit is intended to set forth probable cause in support of the criminal complaint and does not purport to set forth all my knowledge regarding this investigation.**
- 3. On or about February 22, 2022, LORENZI, a resident of Cleveland, Ohio, contacted a resident of the Southern District of Ohio to coordinate a purchase of firearms.**
- 4. On or about February 24, 2022, LORENZI traveled to the Southern District of Ohio and purchased nine (9) firearms for approximately \$3,300.**
- 5. Between the approximate dates of February 24 and March 19, 2022, LORENZI, with others, coordinated approximately seven (7) other firearm purchases. LORENZI and/or the others traveled to the Southern District of Ohio to purchase the firearms. LORENZI, working with others, purchased approximately 114 firearms between the approximate dates of February 24 and March 19, 2022. This included, on March 12, 2022, a purchase of thirty-two (32) SCCY Industries, model CPX-2, 9mm, semi-automatic firearms for approximately \$10,940.**
- 6. On or about March 14, 2022, an individual working with LORENZI expressed interest in purchasing Glock-manufactured firearms. According to the records available, that individual traveled to the Southern District of Ohio and purchased five (5) Glock-manufactured firearms and two (2) SCCY Industries, model CPX-2 firearms. Further, that purchaser traveled to the Southern District of Ohio to purchase the firearms, in a vehicle that was rented in Batavia, New York, and returned to the same location.**
- 7. On or about March 19, 2022, an individual working with LORENZI again traveled to the Southern District of Ohio and purchased approximately forty-two (42) SCCY Industries, model CPX-2, 9mm, semi-automatic firearms.**

8. Between the approximate dates of March 21 through March 25, 2022, law enforcement officers in New York recovered three (3) firearms that have been identified as sold in the Southern District of Ohio to LORENZI, working with others.
9. Between the approximate dates of March 25 and May 26, 2022, LORENZI, working with others, coordinated the purchase of forty (40) SCCY Industries, model CPX-2, 9mm firearms for \$13,000. Further, it was indicated that there was future interest in a weekly purchase of forty (40) firearms.
10. Between the approximate dates of May 17 through May 26, 2022, LORENZI, working with others, engaged in text messages and a telephonic conversation arranging for the purchase of sixteen (16) SCCY Industries, model CPX-2, 9mm, semi-automatic firearms for \$5,200. During those contacts, LORENZI and others arranged for the purchase to occur in Columbus, Ohio, on May 26, 2022.
11. On May 26, 2022, LORENZI, with others traveled from Cleveland, Ohio, to Columbus, Ohio, for the previously arranged purchase of firearms. LORENZI operated his personally owned vehicle and arrived at the designated location. Upon arriving, LORENZI, working with others, engaged in conversation with two (2) ATF Special Agents (SA) who were acting in an undercover capacity. LORENZI and others examined the firearms, and U.S. currency was provided to one of the ATF SA's. Additionally, a bill of sale document was completed for the purchase of the firearms. LORENZI and others were then taken into custody by ATF SA's.
12. An ATF Nexus expert determined that the SCCY Industries, semi-automatic firearms that were transferred to LORENZI and/or those he was working with on May 26, 2022, were not manufactured in the state of Ohio and therefore would have affected interstate and/or foreign commerce to arrive in Ohio. I queried ATF databases and determined that neither LORENZI nor any other parties to the firearms transactions mentioned in this Affidavit possessed a federal firearms license ("FFL") as required to engage in the business of firearms dealing.
13. Based upon the aforementioned information and events, and your affiant's training and experience in dealing with Federal firearms violations, your affiant believes that probable cause exists to believe that between the approximate dates of February 22, and May 26, 2022, Martino D. LORENZI, engaged in a conspiracy to engage in the business of dealing in firearms without a license, in violation of Title 18, United States Code, Sections 371 and 922(a)(1)(A).

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Teresa Petit, ATF Special Agent

Sworn to before me and signed in my presence.


Elizabeth A. Preston Deavers
United States Magistrate Judge

May 26, 2022

Date